STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This permit supersedes the permit dated February 18, 2005.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Sampson Coatings, Inc.
PO Box 6625
Richmond, Va. 23230
Registration No. 50531
County-Plant No.087-0044

is authorized to operate

a paint and coatings mixing facility

located at

301 Hull Street
Richmond, Virginia

in accordance with the Conditions of this permit.

Approved on April 3, 2008 Draft.

Deputy Regional Director

Permit consists of 8 pages.
Permit Conditions 1 to 16.

INTRODUCTION

This permit approval is based on the permit application dated April 7, 1998 including amendment sheets dated June 24, 1998, July 20, 1998, September 24, 1998 ,July 30, 2004 and August 21, 2006. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

1. The existing equipment consists of:

650 gallon 10 hp Falk Mixer (M1)
1000 gallon 10 hp Custom Mixer (M2)
650 gallon 10 hp Falk Mixer (M3)
650 gallon 10 hp Falk Mixer (M4)
650 gallon 15 hp Custom Mixer (M5)
650 gallon 10 hp Falk Mixer (M6)
700 gallon 15 hp Cowles Mixer (M7)
700 gallon Cowles Mixer (M8)
700 gallon 15 hp Cowles Mixer (M9)
700 gallon 15 hp Custom Mixer (M10)
1000 gallon 7.5 hp Custom Mixer (M11)
800 gallon 15 hp Vary Speed Mixer (M12)
400 gallon 5 hp Reeves Mixer (M13)
400 gallon 5 hp Custom Mixer (M14)
500 gallon 7.5 Custom Mixer (M15)
600 gallon 10 hp Reeves Mixer (M16)
1100 gallon 30 hp Reeves Mixer (M17)

The existing equipment consists of:

3000 gallon 50 hp Reeves Mixer (M18)
1000 gallon 100 hp Custom Disperser (DSP1)
650 gallon 60 hp Hockmeyer Disperser (DSP2)
400 gallon 40 hp Hockmeyer Disperser Vary (DSP3)
400 gallon 40 hp Hockmeyer Disperser Vary(DSP4)
25 hp Hockmeyer (DSP5)
30 hp Hockmeyer (DSP6)
15 hp Hockmeyer (DSP7)
25 hp Hockmeyer(DSP8)
500 gallon 5 hp Trumball Blender Vary (BL1)
15 hp Hockmeyer Disperser(DSP9)
Model 20 LT 1993 25 hp(MM1)
Model 20L 1991 25 hp (MM2)
Chicago Boiler 3P sandmill (SM1)
Chicago Boiler 3P sandmill (SM2)
Chicago Boiler 3P sandmill (SM3)
Chicago Boiler 3P sandmill (SM4)
Chicago Boiler 3P sandmill (SM5)
Morrehouse Cowles 30 sandmill (SM6)
350 gallon 40 hp Disperser HS (DSP10)
600 gallon 5 hp Clears Mixer (M19)
500 gallon 3 hp Trumbull Mixer (M20)
750 gallon 5 hp Clears Mixer (M21)
750 gallon 5 hp Clears Mixer (M22)
100 gallon 3 hp Blue PM (stand) (PM1)
200 gallon 7.5 hp White PM (stand) (PM2)
150 gallon 3 hp Red PM (stand) (PM3)
20 gallon 3 hp Green PM (floor) (PM4)
150 gallon 10 hp Yellow PM (stand) (PM5)
300 gallon 10 hp PM (room) (PM6)
350 gallon 20 hp (room) (PM7)
300 gallon 10 hp PM (room) (PM8)
35 gallon 5 hp Steel shot PM Mill (PM9)
10 hp Cowles Dissolver (finishing) (DSS1)
10 hp Cowles Dissolver (finishing) (DSS2)
10 hp Hockmeyer Dissolver (tilt) (DSS3)
10 hp Hockmeyer Dissolver (tilt) (DSS4)
10 hp Cowles Dissolver (finishing) (DSS5)
15 HP Hockmeyer Disperser (finishing) (DSP11)
10 hp Cowles Dissolver (filling line mixer) (DSS6)
60 hp Hockmeyer Disperser (DSP12)
MRM Elgin Model H Paint Filler (PF1)
The existing equipment consists of:

IDEAL SA 15A Twin Filler (PF2)
Neumo Model SAF Paint Filler (PF3)
JH DAY 3 Roll Mill 69546 (RM1)
34 Storage Tanks
550 gallon, 60 hp Cowles Tank (M23)
20 liter Media Mill (MM3)
1000 gallon, 30 hp Blender (M24)
1000 gallon, 30 hp Blender (M25)

The previously permitted equipment consists of:

1100 gallon 30 hp Reeves Mixer (M26) Texture Paint Tank
1100 gallon 30 hp Mixer (M27) Texture Paint Tank
1100 gallon 10 hp blender mixer variable speed (M28) Tank
1100 gallon 10 hp blender mixer variable (M29) Tank
1100 gallon 10 hp blender mixer variable speed (M30) tank
3000 gallon 50 hp Reeves Mixer (M31) tank
(9 VAC 5-80-10 A)

2. Particulate and PM10 emissions from the following paint mixing equipment: DSP1, DSP2, DSP3, DSP4, DSP5, DSP6, DSP7, DSP8, BL1, DSP9, DSP10, DSP12, and M24 shall be controlled by a cyclone or a device that functions like a cyclone. The cyclone or device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. An annual inspection shall be conducted on the cyclone by the permittee to ensure structural integrity.
(9 VAC 5-80-850 and 9 VAC 5-40-900)

3. The permitted facility shall be constructed so as to allow for emission testing and monitoring upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.
(9 VAC 5-80-850 and 9 VAC 5-50-30 F)

4. The annual throughput of paints and coatings for each process shall not exceed 11,800,000 pounds, calculated monthly as the sum of each consecutive 12 month period. The annual throughput of any one hazardous air pollutant, except formaldehyde, shall not exceed 950,000 pounds a year and the annual throughput of any combination of hazardous air pollutants shall not exceed 2,450,000 pounds a year. The annual throughput of formaldehyde shall not exceed 427,440 pounds a year.
(9 VAC 5-80-850)

5. Facility-wide emissions from the operation of the paint and coatings mixing shall not exceed the limits specified below:

Volatile Organic Compounds	85.1 lbs/hr	88.5 tons/yr
Particulate Matter	2.8 lb/hr	3.0 tons/yr
PM10	2.8 lb/hr	3.0 tons/yr
Methyl Isobutyl Ketone	9.1 lbs/hr	9.5 tons/yr
Benzene	9.1 lbs/hr	9.5 tons/yr
Methanol	9.1 lbs/hr	9.5 tons/yr
Ethylene glycol	9.1 lbs/hr	9.5 tons/yr
Formaldehyde	4.1 lbs/hr	4.3 tons/yr
Naphthalene	9.1 lbs/hr	9.5 tons/yr
Phenol	9.1 lbs/hr	9.5 tons/yr

Emissions of any hazardous air pollutant, except formaldehyde, at the facility shall not exceed 9.5 tons per year, and the combined total emissions of all hazardous air pollutants at the facility shall not exceed 24.5 tons per year. Emissions of formaldehyde shall not exceed 4.3 tons per year.
(9 VAC 5-80-90, 9 VAC 5-80-850 and 9 VAC 5-80-900)

6. Facility-wide emissions from the operation of the storage tanks shall not exceed the limits specified below:

Volatile Organic Compounds	9.6 lbs/hr	10.0 tons/yr

(9 VAC 5-80-90, 9 VAC 5-80-850 and 9 VAC 5-80-900)

7. Total facility-wide emissions from the operation of the paint and coatings mixing and the storage tanks shall not exceed the limits specified below:

Volatile Organic Compounds	94.7 lbs/hr	98.5 tons/yr
Particulate Matter	2.8 lb/hr	3.0 tons/yr
PM10	2.8 lbs/hr	3.0 tons/yr
Methyl Isobutyl Ketone	9.1 lbs/hr	9.5 tons/yr

Benzene	9.1 lbs/hr	9.5 tons/yr
Methanol	9.1 lbs/hr	9.5 tons/yr
Ethylene glycol	9.1 lbs/hr	9.5 tons/yr
Formaldehyde	4.1 lbs/hr	4.3 tons/yr
Naphthalene	9.1 lbs/hr	9.5 tons/yr
Phenol	9.1 lbs/hr	9.5 tons/yr

Emissions of any hazardous, except formaldehyde, air pollutant at the facility shall not exceed 9.5 tons per year, and the combined total emissions of all hazardous air pollutants at the facility shall not exceed 24.5 tons per year. Emissions of formaldehyde shall not exceed 4.3 tons per year.
(9 VAC 5-80-90, 9 VAC 5-80-850 and 9 VAC 5-80-900)

8. Visible emissions from any stack or vent shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity. This condition applies at all times except during start-up, shutdown, or malfunction.
(9 VAC 5-80-850 and 9 VAC 5-40-20 and 9 VAC 5-40-940)

9. Emissions shall be controlled by proper operation and maintenance of air pollution control equipment. The permittee shall develop, maintain, and have available to all operators good written operating procedures and a maintenance schedule for the cyclones. A maintenance schedule for all such equipment shall be established and made available to the Piedmont Region for review.
(9 VAC 5-80-850 and 9 VAC 5-40-20 E)

10.. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:

a. Annual throughput of all paints and coatings, in pounds, of each process, calculated monthly as the sum of each consecutive 12 month period.

b. Total throughput of all paints and coatings, in pounds, calculated monthly as the sum of each consecutive 12 month period.

c. Annual throughput of all material held in the storage tanks, in gallons.

d. Annual throughput and emissions of all solvents used, in pounds, for each hazardous air pollutant (HAP), calculated monthly as the sum of each consecutive 12 month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-850 and 9 VAC 5-80-900)

11. This permit may be modified or revoked in whole or in part for cause, including, but not limited to, any of the following actions by the permittee:

a. Willfully making material misstatements in the permit application or any amendments thereto;

b. Failing to comply with the terms or conditions of the permit;

c. Failing to comply with any emission standards applicable to an emissions unit included in the permit;

d. Causing emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application is submitted; or

e. Failing to comply with the applicable provisions of 9 VAC 5-80-1010, 9 VAC 5-80-170-160)

(9 VAC 5-80-900)

12. The permittee shall allow authorized local, state and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-160)

13. If, for any reason, the permitted facility or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner or operator shall notify the Piedmont Region within four (4) business hours of the occurrence. In addition, the owner shall provide a written statement, within fourteen (14) days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shut down.
(9 VAC 5-20-180)

14 In the event of any change in control of ownership of the permitted source, the permittee shall notify the succeeding owner of the existence of this permit by letter and send a copy of that letter to the Piedmont Region.
(9 VAC 5-80-940)

15. Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate your prompt response to requests for information to include, as appropriate: process and production data; changes in control equipment, and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, 2.1-340 through 2.1-348 of the Code of Virginia, 10.1-1314 (addressing information provided to the Board), and 9 VAC 5-170-160 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.
(9 VAC 5-80-900)

16. A copy of this permit shall be maintained on the premises of the facility to which it applies.
(9 VAC 5-80-850)